

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF WASHINGTON AT SEATTLE

In re:

KARL REINKE,

Debtor,

No. 09-19609

APPLICATION TO HIRE LARRY B.
FEINSTEIN AS ATTORNEY FOR DEBTOR
NUNC PRO TUNC

KARL REINKE, the debtor in this Chapter 11 case ("Debtor"), applies to the Court for an order approving the employment of Larry B. Feinstein as Chapter 11 counsel for Debtor. Debtor makes this application under Section 327 of the United States Bankruptcy Code (the "Code"), and Fed. R. Bankr. P. 2014. In support of the application, Debtor states as follows:

1. Debtor filed a Chapter 11 petition on September 17, 2009.
2. The Debtor is a debtor under Sections 1107(a) and 1108(b) of the Code.
3. Debtor retained Larry B Feinstein nunc pro tunc back to the original filing date to advise it regarding the possibility of filing a Chapter 11 petition. Debtor now wishes to employ Larry B Feinstein for the execution of its Chapter 11 case. Debtor has been informed that Larry B Feinstein, the primary attorney involved in this case, is admitted to practice before this Court and has read the Local Bankruptcy Rule 2016.
4. The services to be performed by Larry B Feinstein are necessary in order for Debtor to perform its duties as debtor. Subject to the control of, and further order of the Court, Larry B Feinstein will render the following services to Debtor:
 - a. To take all actions necessary to protect and preserve Debtor's bankruptcy estate, including the prosecution of actions on Debtor's behalf. To undertake, in conjunction as appropriate with special litigation counsel, the defense of any action commenced against Debtor, negotiations concerning litigation in which Debtor is involved, objections to claims filed against Debtor in this bankruptcy case, and the compromise or settlement of claims.
 - b. To prepare the necessary applications, motions, memoranda, responses,

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Vortman & Feinstein
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1 complaints, answers, orders, notices, reports and other papers required from

2 Debtor as debtor-in-possession in connection with administration of this case.

3 c. To negotiate with creditors concerning a Chapter 11 plan, to prepare a Chapter
4 11 plan and disclosure statement and related documents, and to take the steps
5 necessary to confirm and implement the proposed plan of liquidation.

6 d. To provide such other legal advice or services as may be required in connection
7 with the Chapter 11 case.

8 5. Debtor has selected Larry B Feinstein for the following reasons:

9 a. Larry B Feinstein has substantial experience and expertise in the field of
10 debtors' and creditors' rights, insolvency law and bankruptcy.

11 b. Larry B Feinstein has the resources necessary for the quick and efficient
12 prosecution of this case.

13 c. Debtor has confidence in Larry B Feinstein and believes that Larry B Feinstein is
14 well qualified to represent it and the bankruptcy estate in this Chapter 11 case.

15 6. In accordance with the signed Engagement letter attached and/or available for review,
16 Debtor has agreed to compensate Larry B Feinstein on the basis of its ordinary hourly
17 rates, with additional reasonable fees to be paid on the basis of criteria set forth in the
18 Washington Rules of Professional Conduct, including time spent, skill needed to perform
19 legal services properly, preclusion of other employment, fees customarily charged, the
20 amount involved and the results obtained, and the experience, reputation and ability of
21 counsel.

22 7. Debtor and Larry B Feinstein had been paid during the one year period prior to filing,
23 fees of \$3,500 for pre-petition legal services, preparing this Chapter 11, filing the case,
24 and other pre-filing legal services, and has agreed to an initial retainer of \$1,500,
25 deposited by the debtor, which retainer for these proceedings is in Trust. The filing fee
26 has been paid to Mr. Feinstein to disburse \$1,039.00 to their ECF credit card post-
27 petition for the Chapter 11 filing fee.
28

1 8. To the best of the Debtor's knowledge, Larry B Feinstein does not have any connection
2 with Debtor, its creditors, any party in interest, or his respective attorneys or accountants.

3 WHEREFORE, for the reasons stated in this application, Debtor requests that the Court enter an
4 order authorizing him to employ Larry B Feinstein to represent Debtor in this Chapter 11 case nunc pro
5 tunc to the date of the Chapter 11 filing.

6 DATED this 11th day of February, 2010.

7
8 /s/ Larry B. Feinstein

9 _____
10 Larry B. Feinstein WSBA # 6074
 Attorney for Debtor

11 /s/ Karl Reinke
12 Debtor: _____
 Karl Reinke

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